

## Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M3

Date: 22 March 2021

From: NJL Consulting (Consultee ID – 1149350) on behalf of Bloor Homes

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**Matter 3: Strategic Growth (inc. Strategic Sites)**

**Key Issue: Is the growth strategy coherent and based on a clear and robust preparation process? Is it realistic and appropriate in the light of relevant alternatives and is it based on robust and credible evidence?**

**Question 3a) What is the justification for adopting an aspirational growth strategy, led by an ambitious target for new jobs?**

Employment-Led Projections

- 1.1 The Council sets out the target for creating 8,000 to 10,000 new jobs over the Plan Period, based on an employment-led projection, the majority of which would be provided on the two strategic sites (Policy STR3). This growth scenario is derived from forecasted population, household, and dwelling requirements in order to achieve these levels of new employment. These projections date back to 2015 and the publication of the Strategic Options Consultation Document in 2016, however they fail to properly account for the range and scale of the growth initiatives set out in Matter 2a) – all of which will have significant implications on the economic growth of the Borough.
- 1.2 The Council acknowledge in the LDP the Borough's important role '*as a sub-regional economic hub, contributor to output and growth in the Welsh economy as a whole*'<sup>1</sup> and reinforces its involvement as a key partner of the MDA<sup>1</sup>. The stated MDA objectives which were published in 2017 under the Mersey Dee Growth Prospectus and were therefore not able to have been considered by the Council when setting the growth targets under the Strategic Options Consultation Document in 2016.
- 1.3 Similarly, it was only as recent as November 2019 that Welsh Government invested £20m into the Advanced Manufacturing Research Centre's (AMCR) state of the art research and development facility. Despite these significant economic drivers taking effect, the projected growth scenario for jobs has remained static since 2016. Now more than ever, as areas across the UK seek to recover from the economic outfall of the COVID-19 pandemic, it is vital that the plan is prepared positively to cater for economic growth, with both employers and housing provision playing a critical role.

Accrued Shortfall

- 1.4 The Preferred Level of Growth fails to account for the housing backlog accrued over the UDP period. Of the 7,400 new homes required and targeted over the plan period

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<sup>1</sup> Flintshire Deposit LDP (2019) Para. 3.25

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(2000-2015), only 5,388 homes were built. This represents a significant shortfall of 2,012 homes – nearly 30% of the overall UDP requirement.

- 1.5 A key reason for this under delivery is the Council's reliance on strategic sites and inaccurately predicting the length of time it takes to deliver complex, multi-phased sites.
- 1.6 The growth strategy should therefore address this backlog, as well as meeting the forecasted projections for housing and economic growth over the new plan period. It cannot be that a new plan casts a blind eye to such a significant shortfall in unmet housing needs.
- 1.7 Instead, the next Plan period should seek to address the backlog early in the plan period, such as in the first 5 years. The new requirement should therefore be 9,962 homes.

#### Affordable Housing Need:

- 1.8 The methodology for the Preferred Level of Growth fails to consider the need for affordable housing within the County and the impact this could have upon housing requirement for the Plan period.
- 1.9 The LHMAA identifies a shortfall in affordable housing of 238 dwellings per year which comprises 51% of the annual housing requirement. Evidently, this level of annual affordable housing delivery cannot be achieved nor sustained over the plan period. This requires the need for a pragmatic approach to ensuring that sufficient affordable homes are delivered in order to meet needs. One way of achieving this is through increasing the housing requirement and thus the proportion of affordable homes secured.

#### Flexibility:

- 1.10 The increase in flexibility allowed for by the LDP has increased from 14.4% (1000 dwellings) to 18.1% (1,260 dwellings), however this does not represent genuine flexibility given the over reliance on strategic sites (see Appendix 3A – BP10A).
- 1.11 This is demonstrated by the fact that 191 of the additional 260 dwellings allowed for within the Plan simply stem from from increased delivery rates at Northern Gateway over the Plan Period. This equates to nearly 75% of the additional flexibility allowance from a single strategic allocation which has already been evidenced as having significant delivery issues. This emphasises the extent to which over reliance is being placed upon these strategic sites as opposed to identifying other suitable alternatives to meet housing needs and increasing choice within the Borough.

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1.12 This continued over reliance on strategic sites is constraining to the Council rather than providing added flexibility (see response to Matter 2i). In the event that delays occur on one site, this will have strategic implications for the LDP as has been shown in the past.

#### Summary

1.13 In sum, Bloor Homes express concerns over the growth strategy and whether this goes far enough considering how:

- Economic growth opportunities have been downplayed or unaccounted for in growth scenarios, particularly those linked to the established Mersey Dee Alliance objectives, North Wales Growth Deal and the AMRC Cymru.
- The significant housing backlog has yet to be accounted for in the LDP's housing requirement.
- The problem of under-delivery stems from an over reliance upon strategic site allocations. This is emphasised by the extent to which Northern Gateway is relied upon in providing additional flexibility allowance. This approach contradicts the very purpose of building in flexibility into development plans, which is geared around allowing for a sufficient range of sites to potentially come forward should any allocations fail to deliver as expected.

#### **Question 3b) When were:**

##### **i) the Northern Gateway site; and**

##### **ii) the Warren Hall site granted outline planning permission? Have circumstances changed significantly since then?**

1.14 Our assessment on projected delivery rates for these strategic site allocations is detailed in our responses to Questions 3d) and 3e). This response provides a factual summary of each site's planning history and the extent to which circumstances have changed and progressed.

#### Northern Gateway: Northern Gateway

1.15 The extant outline planning permission, LPA (Ref: 049320) for the Airfield site was granted in January 2013 for the following:

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*'Outline application for the redevelopment of a strategic brownfield site for an employment led mixed use development with new accesses and associated infrastructure including flood defences and landscaping.'*

- 1.16 In August 2018 a discharge of condition application (Ref: 058514) for the updated Masterplan was submitted and approved by the Council. This Masterplan allowed for residential development of up to 725 dwellings across the 21.59ha site. This application was approved 7 years after the adoption of the Flintshire UDP and 3 years after the UDP Plan Period had ended.
- 1.17 Development has since commenced on site with the first phase of development under construction for 283 dwellings by Countryside Properties. This followed the approval of reserved matters planning permission (Ref: 059514) in 2018, 7 years after the adoption of the Flintshire UDP and 3 years after the UDP Plan Period had ended.
- 1.18 An application for approval of reserved matters (Ref: 058990) in relation to Phase 3 Enabling Works to Plots H3 and H5 was recently approved in May 2020. This application was approved 8 years and 8 months after the adoption of the Flintshire UDP and 4 years after the UDP Plan Period.

#### Northern Gateway: Pochin-Goodman

- 1.19 The former Corus Garden City Site was granted outline permission (Ref: 050125) for an employment led mixed use development in May 2014 just one year before the UDP Plan Period was due to expire. The outline planning permission secured permission for:
- 'Employment-led mixed-use development, incorporating Logistics and Technology Park (B1, B2, B8) with residential (C3), local retail centre (A1), hotel (C1), training and skills centre (C2, D1), new parkland; conversion of buildings, demolition of barns; and associated infrastructure comprising construction of accesses, roads, footpaths / cycle paths, earthworks and flood mitigation / drainage works at Northern Gateway, Land off Welsh Road, Deeside.'*
- 1.20 The development approved comprised of a maximum of 120,000m<sup>2</sup> of Industrial /Warehousing (B2/B8), 3,300m<sup>2</sup> of Office (B1), 7,400m<sup>2</sup> of Light Industrial (B1), 3,000m<sup>2</sup> of Hotel (C1), 2,500m<sup>2</sup> of Retail (A1), 4,000m<sup>2</sup> of Training and Skills Centre (C2/D1), and 600 Residential dwellings (C3).
- 1.21 A Section 73 Application was submitted in February 2017 to vary conditions 5 (mix of development and phasing), 32 (highway works) and 38 (off-site highway works) and removal of conditions 6 (highway works at Station Road/Asda junction) and 10 (flood defence works).

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- 1.22 This application sought approval to vary planning condition 5 (Ref: 056540), increasing the level of residential dwellings on the site from 600 to 770. This followed an assessment of the costs associated with delivery of the road and site infrastructure on the site. The application was approved 5 years and 5 months after the adoption of the Flintshire UDP and 2 years after the UDP Plan Period.
- 1.23 The first phase of residential development is now due to be delivered by Keepmoat for 129 homes (Ref: 060411) following the approval of reserved matters consent in March 2020 subject to a S106 Agreement. No decision notice or S106 Agreement has been finalised nor any discharge of condition applications to enable a start on-site. The application was approved 8 years and 5 months after the adoption of the Flintshire UDP and 2 years after the UDP Plan Period.

#### Warren Hall

- 1.24 Outline planning permission (Ref: 038744) was granted for the site at Warren Hall in 21<sup>st</sup> April 2008 for the following:
- 'Application (with details of siting and access) for 76,394 square metre business park (Class B1), hotel and associated leisure facilities, roadway, car parking, drainage and landscaping, and off-site roadworks including new slip roads from A55(T)'*
- 1.25 An application (Ref: 048360) to vary condition no.2 attached to the outline planning permission was approved on 19<sup>th</sup> July 2011 in order to extend the time for submission of a reserved matters application by 3 years.
- 1.26 A subsequent reserved matters application (Ref: 051965) was submitted in March 2014 but later withdrawn just 1 year before the UDP Plan Period was due to expire.
- 1.27 Evidently, the site has failed to be delivered since securing outline planning permission with there being no change in circumstances. The original outline consent has since lapsed with no subsequent planning application submitted. In the absence of any planning permission, developer interest and noting the site's strategic nature, Bloor Homes strongly contend with the Council's assertion that housing can be delivered by 2023.

**Question 3c) How will their strategic allocation in the LDP improve their viability and deliverability? Are the rates forecast for their delivery in the LDP realistic and achievable?**

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- 1.28 As the Council acknowledge in their Background Paper 10A the Warren Hall site 'has had planning permission for a number of years for a Business Park'<sup>2</sup> yet despite that has failed to materialise into any development. The site secured planning permission prior to the adoption of the Flintshire UDP as an employment site under UDP Policy EM2. Despite benefitting from outline planning permission and a strategic allocation under the local plan, the Welsh Government (as landowner) were unable to stimulate any level of market interest to bring the site forward. The planning permission has since lapsed.
- 1.29 Similarly, in relation to the Northern Gateway allocation, it has only been as recent as 2019 that any form of development has been able to come forward.
- 1.30 It is remarkable that both these sites have been allocated for development in successive Alyn and Deeside and Flintshire development plans for the last 25 years and yet no meaningful development has taken place. This therefore reinforces the point that securing allocations alone provides little if any benefit to sites such as Warren Hall and Northern Gateway in promoting their viability and deliverability.

#### Achievability and Delivery:

- 1.31 The Development Plan Manual makes clear the process on rolling forward previous allocations through the LDP process (NJL emphasis underlined):

*'Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered. The sites should be subject to the same candidate site process requirements as new sites i.e. they must be demonstrated to be sustainable and deliverable. If an LPA wishes to retain such sites but cannot evidence they will be delivered, i.e. for aspirational or regeneration purposes, they can still be allocated in the plan but not relied upon as contributing to the provision.'*<sup>3</sup>

- 1.32 It is acknowledged that in the case of Northern Gateway there is evidence of delivery with the first phase of housing coming forward and subsequent planning permissions secured on the next phase of 129 dwellings. It is therefore not challenged that this strategic site can be rolled forward and contribute to the Borough's housing provision over the Plan Period.
- 1.33 Both sites do however represent strategically complex developments evidenced by the abnormally high development costs which have required significant public sector

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<sup>2</sup> Background Paper 10A : Update re Housing Land Supply and Delivery (Jan 2021) Para. 2.6.2

<sup>3</sup> Development Plans Manual (2020) p. 120

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investment and assistance. Despite being framed as 'employment-led' allocations, the technical and ground conditions of the site, necessitate a significant residential element be brought forward as enabling development. In their own right, the delivery of employment development would not be financially viable on this site. These viability constraints therefore also risk the ability to deliver affordable housing on these sites.

- 1.34 In this context there are important questions and areas of concern on the proposed delivery rates. Given the extent of infrastructure and enabling works involved to open up future plots, proposed delivery rates seem overly ambitious.
- 1.35 While Appendix 3A – Housing Trajectory set out in BP10A provides an indication on delivery rates with a brief commentary on the status of each site, there is no breakdown in timeframes for pre-application discussions, submission to determination, discharging of conditions through to start on-site. Table 20 of the Development Plans Manual sets out this required information within a template. In its current form the housing trajectory does not set out the timing assumptions that have been made by the Council to inform delivery rates. There is instead a reliance upon information set out in the supporting Masterplans.
- 1.36 As just one example, the anticipated timescales for delivering Phase 1 (129 dwellings) of the Pochin-Goodman land are already behind. Despite Keepmoat Homes securing permission in 2020, this remains subject to a S106 Agreement with a decision notice still yet to be issued. No pre-commencement conditions have been discharged in order to enable a start on-site meaning that the site will not deliver until late 2021/ spring 2022 at the earliest.
- 1.37 This corresponds with national evidence which highlights that sites of approximately 100+ dwellings can take on average 3 years from application validation to the point of delivering the first dwelling<sup>4</sup>. For larger sites up to 499 units this lead-in period increases to 4 years.
- 1.38 Based on these conservative assumptions, one would have expected a planning application for Phase 2 to have already been submitted in 2020 in order to hit the projected delivery rate of 52 dwellings by 2022. This is a critical point when reviewing the accompanying Phasing Plan given that the largest parcel of development (Phase 4 – 400 units) relies upon these early phases.
- 1.39 The associated delays with Phases 1 and 2 are inherent for complex sites such as Northern Gateway and reinforces the need for a more prudent approach to delivery rates. There is currently not enough robust evidence to support these ambitious delivery rates which range as high as 120 to 150 dwellings per annum for most of the Plan Period. Further analysis on the deliverability of both strategic sites over the Plan Period is set out

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<sup>4</sup> Lichfields – Start to Finish 2<sup>nd</sup> ed. (2020) Figure 4

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in our Updated Housing Trajectory (see response to Matter 7) including other housing allocations.

- 1.40 While it is accepted that the Deeside housing market itself could accommodate the proposed scale of residential development over the Plan Period (1185 dwellings), it is important to recognise there are multiple sub-markets within the strategic market area. Maximising the number of dwellings into the same sub-area which relies upon the same site infrastructure at the same time does not provide sufficient choice. It is instead constraining to the local authority in being so reliant upon a single strategic site, at a time when the Council should be seeking to diversify and extend the range of housing sites across sub-markets.
- 1.41 Evidence through our stakeholder engagement has shown that the first residential phase on Northern Gateway is delivering at around 40 dwellings per annum, however it does not follow that the same rate will be achieved across multiple outlets that may also come forward.
- 1.42 While the Masterplan refers to market interest, there has been no formal Market Assessment to understand and evidence this position which has clear implications on build out rates. A diminished sales rate should therefore be assumed in order to account for the fact that Northern Gateway will remain as a construction site for the duration of the plan period, especially given the extent of on-site highway infrastructure works.
- 1.43 In relation to Warren Hall, the technical assessments undertaken to date are limited and provide broad parameters for the site's development potential. Further detailed assessment is required on aeronautical constraints given the siting of Hawarden Airport, which could potentially limit vast swathes of the site to less than two storeys in height. This would have clear implications on market interest both for prospective developers and homebuyers and raises doubts over the proposed delivery rates. As yet there remains no developer attached to the site with significant public investment still required for enabling infrastructure works (noticeably on utilities).
- 1.44 Table 2A of BP10A incorrectly implies that Warren Hall benefits from planning permission. The site has in fact a lapsed outline planning permission which was consented some 15 years ago for a business park with no other planning permissions secured in that time. Taking the above factors into account, Bloor Homes strongly oppose the allocation of Warren Hall as a deliverable site, when noting the DPM requirement for demonstrating 'clear evidence' and a 'substantial change in circumstances'.
- 1.45 Evidence has shown that regardless of site size it takes approximately 3 years from the date of securing outline planning permission to the first dwelling being completed<sup>5</sup>. For

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<sup>5</sup> Lichfields: Start to Finish 2<sup>nd</sup> ed. (2020) p.5

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more complex, strategic sites such as Warren Hall this lead-in period is extended due to technical and infrastructure delivery constraints. It can therefore be concluded with some certainty that the site will not deliver in 2023 as projected by the Council in the housing trajectory. Our assessment is that the site will not deliver until later in the Plan Period in 2027.

#### **Question 3d) How advanced is development on the Northern Gateway site? What is the reason for its allocation rather than recording it as a commitment?**

- 1.46 The site's planning history and progress is covered in the response to Matter 3b) and detailed in the respective Masterplan documents submitted at the Deposit-LDP stage.
- 1.47 With planning permission to deliver 1,325 dwellings to 2030 and beyond, the site is of a strategic scale which would have clear implications on the LDP and ability for the Council to meet their housing requirement. This allocation alone accounts for 16% of the Council's housing requirement of 7,950 dwellings. It is assumed that by rolling forward this allocation from the UDP, the Council are continuing to place a strong reliance on the delivery of this strategic site by placing it at the heart of the LDP.
- 1.48 This is significant given the failure of this strategic site to be built out at all during the UDP plan period, resulting in the previous housing target being unfulfilled and leading to a significant accrued shortfall in housing that has yet to have been addressed by the Council. The Inspector reporting on the Flintshire UDP acknowledged the issues with allocating the Northern Gateway, highlighting that *'There is no doubt that delivery of the scheme within the plan period will be tight'*<sup>6</sup>. Indeed, it took until 2019 for any form of development to commence on Northern Gateway – 4 years after the UDP Plan Period.
- 1.49 Whilst Bloor Homes do not object to the proposed allocation, the extent to which this is relied upon in the Council's housing trajectory to deliver the Plan, both in terms of open market and affordable housing, is questionable. It is important that the Plan is robust and flexible enough to accommodate for changing circumstances, particularly for strategic, complex sites such as Northern Gateway.

#### **Question 3e) Is there enough site-specific guidance and information in the LDP to satisfactorily address the individual circumstances, including constraints, on the two strategic sites? Are there master plans or development briefs for them? How will the principles of placemaking be applied to these sites?**

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<sup>6</sup> Inspectors Report on the Flintshire UDP (2011) Para. 11.158.12

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#### Infrastructure Delivery and Viability

- 1.50 Bloor Homes note that both strategic sites require significant enabling works and large-scale infrastructure in advance of significant delivery. If this infrastructure and enabling development is not delivered early in the delivery programme it will result in delays to the rate in which the sites can be built out.
- 1.51 If the Council adopts the LDP later this year, this will only leave 9 years of the plan period remaining. Even with minimal constraints, it is acknowledged that strategic sites have much longer lead-in times. Whilst it is accepted that no site is the same and there may be variations, it is important that the LDP is sufficiently realistic and provides absolute clarity to ensure a housing supply is maintained throughout the plan period. To address the issue, the Council should adopt a longer plan period and allocate additional nonstrategic sites to meet the housing need. In the short term, it also needs to identify deliverable sites to meet shorter term requirement.
- 1.52 PPW11 is also explicit in the requirement for appropriately detailed viability assessments to be submitted in support of 'key sites' at the Candidate Sites stage and Deposit-LDP stage, adding that '*as part of demonstrating the deliverability of housing sites, financial viability must be assessed prior to their inclusion as allocations in a development plan*'<sup>7</sup>. This fully aligns with the requirements for 'clear evidence' to justify rolled forward allocations as required by the Development Plans Manual.
- 1.53 PPW11 continues to state that:
- 'In addition, for sites which are key to the delivery of the plan's strategy a site specific viability appraisal must be undertaken through the consideration of more detailed costs, constraints and specific requirements'*<sup>8</sup>.
- 1.54 With Policy STR3 identifying both Northern Gateway and Warren Hall as strategic sites, it is clear they are fundamental to the delivery of the LDP and are therefore considered as 'key sites'. It is therefore concerning that no site-specific viability evidence has been submitted alongside these proposed allocations at any stage through the plan-making process. Nor do any of the supporting Masterplans provide any further detail on this key issue.
- 1.55 The only supporting viability evidence is a borough-wide study undertaken by the District Valuer into the delivery of affordable housing provision.
- 1.56 This represents a real shortcoming in the required evidence base to justify the delivery of these strategic sites, given their inherent complexity and scale of infrastructure costs

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<sup>7</sup> Planning Policy Wales 11<sup>th</sup> ed. (2021) Para. 4.2.19

<sup>8</sup> Planning Policy Wales 11<sup>th</sup> ed. (2021) Para. 4.2.19

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involved to open up sites and future phases for development. Further information is therefore required to show how each scheme can remain viable while delivering the associated infrastructure, site enabling works and planning obligations.

#### Site Constraints - The Northern Gateway

- 1.57 The site is located in CC Flood Zone 1, where it is advised that there should be a presumption against highly vulnerable development on this site. Under the outline planning permission, it is noted that major investment is to be directed towards flood defences with the details secured for approval under Condition 7. In June 2013 planning permission (Ref: 050730) was granted for a scheme to strengthen the flood defences of the River Dee. The approved works have since been implemented in 2015.
- 1.58 The site has no further technical constraints which could not be overcome through further site assessment and mitigation.
- 1.59 While Bloor Homes do not contest the inclusion of this strategic site within the LDP, its complexity in delivery across several phases and market factors necessitates that a conservative approach is taken to forecasting build out rates.
- 1.60 Site Constraints – Warren Hall
- 1.61 The Warren Hall site is particularly constrained by its relationship with Hawarden Airport, located 2km to the north-west of the site. Due to significant fall in levels the supporting Warren Hall Masterplan explicitly states that *'the development of the Warren Hall site will be constrained by the operation of the runway'*<sup>9</sup>. With potentially only 22.3% of the overall site capable of accommodating two-storey development – circa 60 dwellings, and the need for further detailed assessments to properly establish the potential quantum and height of development that can be achieved across the site, there are clear uncertainties over the feasibility of the Warren Hall site.
- 1.62 While height constraints and ground conditions would be less restrictive to support lower rise storage distribution facilities, it would have clear implications on securing the right type of housing product within the local area. Limiting portions of the site will not be as attractive to the local market, impacting upon absorption and delivery rates in the process and more importantly the delivery of the LDP.
- 1.63 There are also noticeable infrastructure requirements and diversions which need to be accommodated in order to open up the site for development of this scale including:
- 11kV and 33kV overhead lines crossing through the site.

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<sup>9</sup> Warren Hall Masterplan and Delivery Statement (2019) p.4

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- Openreach underground apparatus east side of Warren Hall Court.
- Openreach underground apparatus across proposed site accesses.
- Hafren Dyfrdwy Water (HDW) have confirmed insufficient capacity in the local network requiring additional reinforcement to their network.

1.64 All the above represent significant abnormal costs, however there is no clear evidence within the Delivery Statement of any funding mechanism to overcoming such constraints, noting the significant public sector investment already towards junction improvements at the interchange of the A5104 and A55(T). The 2023 target for commencement of development for a site with significant development costs and constraints, no planning permission or developer interest is therefore extremely questionable and does not provide robust enough evidence as required by the DPM.

#### Masterplans:

1.65 The Masterplan prepared on behalf of the Northern Gateway site and Warren Hall both have their shortcomings in providing sufficient information, particularly in relation to the precise scope and phasing of infrastructure and enabling works. As discussed, there is minimal detail over costings and funding mechanisms to underpin the delivery of these works.

1.66 Due to the siting of employment uses alongside housing, there are particular concerns from a place-making perspective both strategic sites, however this is more so in relation to the suitability of the proposed housing at Warren Hall.

1.67 Due to site constraints and the primary role of the strategic site to deliver employment land (as highlighted by the original outline consent), the proposed housing has been sited along the southernmost portion of the site. This raises several issues in terms of promoting a sense of place as a high-quality residential neighbourhood for the following reasons:

- The principal point of access to the proposed housing development will require residents to access through the employment estate which will comprise of a significant quantum of industrial and storage/ distribution uses, offering few placemaking opportunities.
- While a landscaped buffer is identified to help delineate and soften any impact between employment and residential uses, the sheer scale of employment development proposed cannot be underestimated in terms of visual and residential amenity that would be felt 'on the ground'.

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- In order to mitigate against the above impacts and important aeronautical constraints, there is no other suitable option but to segregate the proposed dwellings along the southern boundary of the site. This reinforces a sense of separation and isolation from the wider settlement of Broughton and everyday amenities and facilities that would be required to meet the needs of residents.
- While the proposed commercial hub will provide an opportunity for some retail/leisure offer for residents, this has been identified to the north west corner of the site c. 800+metres away from the propose zone for residential development. This would again only be accessible through a major employment estate.
- With additional detailed assessments still required to establish the extent of aeronautical constraints there is still a significant risk that a proportion of housing will be limited to single storey in height. This is neither seen as an attractive product to the local market nor appealing to any elderly demographic given the lack of accessibility and sustainability of the site's location.

1.68 The concerns raised on the place-making at Warren Hall are inextricably tied to the site's constrained location, the siting of dwellings within this strategic site and the lack of any direct relationship to Broughton (also see response in Matter 4b). PPW11 seeks to promote and enable *'the provision of a range of well-designed and located homes which are well connected to existing retail and commercial centres situated at the heart of our communities and job opportunities'*<sup>10</sup>. As highlighted above, Bloor Homes do not consider that the proposed residential development at Warren Hall delivers on this key theme under national policy.

#### Summary

1.69 There remain significant voids in the evidence base to support the proposed housing trajectory and roll forward of both the Northern Gateway and Warren Hall allocations. While the allocation at Northern Gateway will contribute over the Plan Period, further evidence is required on viability and phasing matters to demonstrate delivery to the extent that is being proposed.

1.70 In terms of Warren Hall, there has simply been no evidence of market interest or sign of development coming forward. The site remains highly constrained technically and from its segregation with the wider settlement of Broughton. Consequently, there are a litany of matters which raise doubts over the site's suitability to provide a quality sense of place and good living environment.

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<sup>10</sup> Planning Policy Wales 11ed. (2021). Para. 4.02

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- 1.71 To ensure the Plan is robust Bloor Homes conclude that alternative sites should be considered to avoid the Council repeating past mistakes and failing to deliver on the housing requirement.